

## **Remarks**

In the Office Action, the Examiner restricted out newly submitted claims 64-74 and stated that the new claims are directed to an invention independent or distinct invention from the invention as originally claimed. The Examiner also objected to the specification as failing to provide proper antecedent basis for the claimed subject matter. The Examiner also rejected claims 46-51 under 35 U.S.C. §101. The Examiner also rejected claims 20, 24-27, 31, 35-37, 42-44, 46-50, 52, 53, 56-58, and 63 under 35 U.S.C. §102(e) as being anticipated by the U.S. Patent 6,404,445 issued to Galea, et al. (“Galea”). The Examiner also rejected claims 59-62 under 35 U.S.C. §103(a) as being unpatentable over Galea in view of the U.S. Patent 7,076,784 issued to Russell, et al. (“Russell”). The Examiner also rejected claims 21-22 under 35 U.S.C. §103(a) as being unpatentable over Galea in view of the U.S. Patent 6,564,218 issued to Roth (“Roth”). The Examiner also rejected claims 23, 32, and 51 under 35 U.S.C. §103(a) as being unpatentable over Galea in view of the U.S. Patent 7,093,263 issued to Sexton, et al. (“Sexton”). The Examiner also rejected claim 38 under 35 U.S.C. §103(a) as being unpatentable over Galea in view of the U.S. Patent 5,818,936 issued to Mashayekhi (“Mashayekhi”).

In this Amendment, Applicants have canceled claims 64-74. However, Applicants have not amended any claims or added any new claims. Accordingly, claims 20-27, 31-32, 35-38, 42-44, 46-53, and 56-63 will be pending after entry of this Amendment.

### **I.      Restriction of claims 64-74**

In the Office Action, the Examiner withdrew newly submitted claims 64-74. Specifically, the Examiner stated that claims 64-74 are directed to an invention independent or distinct invention from the invention as originally claimed. In this response, Applicants have canceled claims 64-74. Applicants reserve the right to file continuing applications to pursue the claims that were canceled in response to this restriction.

## **II. Objection to Specification**

In the Office Action, the Examiner objected to the specification. Specifically, the Examiner stated that the specification fails to provide proper antecedent for claim 59 because the claim recites “first and second users having different roles”. *See* Office Action, pages 3-4.

Applicants respectfully disagree with the Examiner that the specification does not provide proper antecedent for claim 59. The specification provides several examples of user having different roles. For example, in describing custom user interface generation, the specification states, “if client 215 identifies itself or states as a preference that the user interface would be used by a sales person, then pricing and product information may be made the prominent or most easily accessible of the data in database 210 rather than human resource information which may be of less interest to the eventual user.” *See* specification, page 16, line 27-page 17, line 6. Clearly, in this example, one of ordinary skill in the art would understand that a sales person is a role assigned to a user, and based on this role, the user is provided with a user interface that displays sales information

more prominently. Accordingly, Applicants respectfully request withdrawal of the specification objection.

## **II. Rejection of claims 46-51 under 35 U.S.C. §101**

In the Office Action, the Examiner rejected claims 46-51 under §101 as being directed towards non-statutory subject matter. Specifically, the Examiner stated that the claims are directed to software *per se* because it includes a server and a database.

Applicants respectfully disagree that a system is directed towards software *per se* if it includes a database and a server. According to the MPEP, software is not *per se* non-statutory, but is only non-statutory when it exists as a description, rather than as part of a system with physical attributes. In contrast, “[w]hen a computer program is recited in conjunction with a physical structure, such as a computer memory, USPTO personnel should treat the claim as a product claim.” MPEP § 2106.01(I). Here, the system itself is described in terms that indicate it is a physical structure. For example, the system is described as having a database and a server *communicatively coupled* to the database. If the system were merely descriptive, then two parts of the system (the server and the database) could not be described as “communicably coupled” to each other. Accordingly, Applicants respectfully submit that the system is statutory under 35 U.S.C. §101.

In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the §101 rejection of claims 46-51.

## **III. Rejection of claims 20-27**

In the Office Action, the Examiner rejected claim 20 under §102(e) as being anticipated by Galea. Claims 21-27 are dependent directly or indirectly on claim 20.

Claim 20 recites a method for creating a description of a user interface that transacts with a database. The database has a data model that includes several entities. The description is created using the data model of the database. The method classifies the entities into entity types. In classifying, the method determines whether a first entity satisfies a first set of conditions and classifies the first entity as a first entity type upon determining that the first entity satisfies the first set of conditions. The method creates the description of the user interface based upon the classification of the entities.

For at least the following two reasons, Applicants respectfully submit that Galea does not disclose all claim limitations to anticipate claim 1. *First*, Galea does not disclose classifying entities into entity types. In the Office Action, the Examiner cited Galea, column 5, lines 23-50, and stated that this section discloses entities that are classified as user interface elements. *See* Office Action, page 34. The cited section describes databases that have products or services (i.e., domains). Specifically, a product in a database has descriptive information (i.e., prerequisite tags) that indicate graphical user element type for that product.

Although the product has descriptive information, Galea discloses a system in which entities are not classified into entity types. Instead of classifying entities, Galea discloses a modeling application in which a user manually enters the descriptive information for the product. *See* Galea, Figure 4, box 402; *see also*, Fig. 7, box 703. This modeling application includes a number of input fields that allow the user to enter the descriptive information for that product. *See* *Id.*, Figures 8. Hence, in Galea, the user enters the descriptive information rather than performing a classifying operation that is

recited in the claim.

*Second*, as Galea does not classify entities, Galea does not disclose (1) determining whether an entity satisfies a set of conditions and (2) classifying the entity as an entity type upon determining that the entity satisfies the set of conditions. In the Office Action, the Examiner cited column 5, lines 25-30 of Galea as disclosing the determining and classifying operations. *See* Office Action, page 36. The cited section describes the descriptive information that may indicate the graphical user interface elements for a product. However, there is no discussion in the cited section about determining whether an entity satisfies a set of conditions and classifying upon the determination that the entity satisfies the set of conditions. In fact, Galea does not even mention the word “classifying” in the cited sections or anywhere throughout his specification.

As stated above, in Galea, a user indicates the graphical user interface elements through a modeling application, such as the one illustrated in Figure 8 of Galea. As such, Galea does not perform the determining and classifying operations that is recited in the claim. If the Examiner disagrees, Applicants respectfully request the Examiner to clearly point out (e.g., by providing column and line numbers) what is the set of conditions that Galea uses to classify entities into entity types.

Accordingly, Applicants respectfully submit that Galea does not render claim 20 unpatentable. As claims 21-27 are dependent directly or indirectly on claim 20, Applicants respectfully submit that claims 21-27 are patentable over Galea for at least the reasons discussed above for claim 20. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 20-27.

#### **IV. Rejection of claims 31-33**

In the Office Action, the Examiner rejected claim 31 under §102(e) as being anticipated by Galea. Claims 32 and 33 depend directly on claim 31. Claim 31 recites a computer readable medium storing a computer program which when executed by at least one processor creates a description of a user interface. The user interface transacts with a database having a data model that includes several entities. The description is created using the data model. The computer program classifies the entities into entity types. In classifying, the computer program determines whether a first entity satisfies a first set of conditions and classifies the first entity as a first entity type upon determining that the first entity satisfies the first set of conditions. The computer program creates the description of the user interface based upon the classification of the entities.

Applicants respectfully submit that Galea does not disclose the computer readable medium of claim 31. In the Office Action, the Examiner rejected claim 31 under the same rationale as claim 20. Accordingly, for reasons similar to those stated above for claim 20, Applicants respectfully submit that Galea does not disclose classifying entities into entity types. Also, for reasons similar to those stated above for claim 20, Applicants respectfully submit that Galea does not disclose classifying an entity upon determining that the entity satisfies a set of conditions.

Accordingly, Applicants respectfully submit that Galea does not render claim 31 unpatentable. As claims 32 and 33 are dependent directly on claim 31, Applicants respectfully submit that claims 32 and 33 are patentable over Galea for at least the reasons discussed above for claim 31. In view of the foregoing, Applicants respectfully

request reconsideration and withdrawal of the rejection of claims 31-33.

**V. Rejection of claims 35-38**

In the Office Action, the Examiner rejected claim 35 under §102(e) as being anticipated by Galea. Claims 36-38 depend directly on claim 35. Claim 35 recites a method for generating a user interface that transacts with a database. The database has a data model that includes several entities. The method receives a description of the user interface that is based upon classification of several entities into entity types. The classification includes classification of a first entity as a first entity type upon determination that the first entity satisfies a first set of conditions. The method generates the user interface using the description of the user interface.

Applicants respectfully submit that Galea does not disclose the method of claim 35. In the Office Action, the Examiner rejected claim 35 under the same rationale as claim 20. Accordingly, for reasons similar to those stated above for claim 20, Applicants respectfully submit that Galea does not disclose receiving a description of a user interface that is based upon classification of entities into entity types. Also, for reasons similar to those stated above for claim 20, Applicants respectfully submit that Galea does not disclose classification of an entity as an entity type upon determination that the entity satisfies a set of conditions.

Accordingly, Applicants respectfully submit that Galea does not render claim 35 unpatentable. As claims 36-38 are dependent directly on claim 35, Applicants respectfully submit that claims 36-38 are patentable over Galea for at least the reasons

discussed above for claim 35. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 35-38.

#### **VI. Rejection of claims 42-44**

In the Office Action, the Examiner rejected claim 42 under §102(e) as being anticipated by Galea. Claims 43 and 44 are dependent directly on claim 42. Claim 42 recites a computer readable medium storing a computer program which when executed by at least one processor generates a user interface. The user interface transacts with a database having a data model that includes several entities. The computer program receives a description of the user interface. The description is based on classification of the entities into entity types. The classification includes the classification of a first entity as a first entity type upon determination that the first entity satisfies a first set of conditions. The computer program generates the user interface using the description of the user interface.

For at least two reasons, Applicants respectfully submit that Galea does not disclose the computer readable medium of claim 42. *First*, for reasons similar to those stated above for claim 20, Applicants respectfully submit that Galea does not disclose a computer program that receives a description where the description is based on classifying the entities into entity types. *Second*, for reasons similar to those stated above for claim 20, Applicants respectfully submit that Galea does not disclose classification of an entity as an entity type upon determination that the entity satisfies a set of conditions.

Accordingly, Applicants respectfully submit that Galea does not render claim 42 unpatentable. As claims 43 and 44 are dependent directly on claim 42, Applicants

respectfully submit that claims 43 and 44 are patentable over Galea for at least the reasons discussed above for claim 42. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 42-44.

## **VII. Rejection of claims 46-51**

In the Office Action, the Examiner rejected claim 46 under §102(e) as being anticipated by Galea. Claims 47-51 are dependent directly or indirectly on claim 46. Claim 46 recites a system that includes a database that has a data model including several entities. The system includes a server coupled communicatively to the database. The server creates a description of a user interface that transacts with the database. The description is based on classification of the entities into entity types. The classification includes classification of the first entity as a first entity type upon determination that a first entity satisfies a first set of conditions.

Applicants respectfully submit that Galea does not disclose the system of claim 46. In the Office Action, the Examiner rejected claim 46 under the same rationale as claim 20. Accordingly, for reasons similar to those stated above for claim 20, Applicants respectfully submit that Galea does not disclose creating a description based on classification of entities into entity types. Also, for reasons similar to those stated above for claim 20, Applicants respectfully submit that Galea does not disclose classification of an entity upon determination that the entity satisfies the set of conditions.

Accordingly, Applicants respectfully submit that Galea does not render claim 46 unpatentable. As claims 47-51 are dependent directly or indirectly on claim 46, Applicants respectfully submit that claims 46-51 are patentable over Galea for at least the

reasons discussed above for claim 46. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 46-51.

### **VIII. Rejection of claims 52-57**

In the Office Action, the Examiner rejected claim 52 under §102(e) as being anticipated by Galea. Claims 53-57 are dependent directly or indirectly on claim 52. Claim 52 recites a computer that includes a description of a data store. The computer includes a browser. The computer includes an application for generating user interface elements by using the description and by retrieving a data set from the data store to populate at least one user interface element. The user interface elements are for displaying in the browser, where at least one user interface element is for receiving queries for the data store.

Applicants respectfully submit that Galea does not disclose the computer of claim 52. For instance, Galea does not disclose a computer that includes an application for generating a user interface by using and description and by retrieving a data set from a data store to populate at least one user interface element. Instead, Galea describes compilation of a configuration domain into a secure, binary compressed format. *See* Galea, column 5, lines 51-59. Specifically, Galea states that all valid information and possible configurations are downloaded at one time from the server to the client so that the user can browse the information without accessing the server. *See* Galea, column 5, line 60-column 6, line 2. In other words, Galea describes sending a file that includes all configuration information for the user interface at once. This is in contrast to generating a

user interface elements by using a description and by retrieving a data set from a data store to populate at least one user interface element.

Accordingly, Applicants respectfully submit that Galea does not render claim 52 unpatentable. As claims 53-57 are dependent directly or indirectly on claim 52, Applicants respectfully submit that claims 53-57 are patentable over Galea for at least the reasons discussed above for claim 52. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 52-57.

#### **IX. Rejection of claims 58 and 63**

In the Office Action, the Examiner rejected claim 58 under 35 U.S.C. §102(e) as being anticipated by Galea. Claim 63 is dependent directly on claim 58. Claim 58 recites a method that receives a first request for a first user interface to transact with a first data store. The method supplies a first description to generate the first user interface. The method receives a second request for a second user interface to transact with a second data store. The method supplies a second description to generate the second user interface. The first and second descriptions differ.

Applicants respectfully submit that Galea does not disclose the method of claim 58. For instance, Galea does not disclose supplying a first description to transact with a first data store and a second description to transact with a second data store. Instead, Galea describes compilation of a configuration domain into a secure, binary compressed format. *See* Galea, column 5, lines 51-59. Specifically, Galea states that all valid information and possible configurations are downloaded at one time from the server to the client so that the user can browse the information without again accessing the server.

*See* Galea, column 5, line 60-column 6, line 2. Hence, Galea describes sending a file that includes all configuration information for the user interface at once, where all browsing of the information in the domain occurs on the client side.

Accordingly, Applicants respectfully submit that Galea does not render claim 58 unpatentable. As claim 63 is dependent directly on claim 58, Applicants respectfully submit that claim 63 is patentable over Galea for at least the reasons discussed above for claim 58. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 58 and 63.

#### **X. Rejection of claims 59-62**

In the Office Action, the Examiner rejected claim 59 under §103(a) as being unpatentable over Galea in view of Russell. Claims 60-62 are dependent directly or indirectly on claim 59. Claim 59 recites a method for providing descriptions of user interfaces to users. The user interfaces are for transacting with a data store. The method receives a first request from a first user. The method receives a second request from a second user. The first and second users have different roles. The method supplies a first description to the first user and a second description to the second user. The first and second descriptions are different based on the roles of the users.

Applicants respectfully submit that the combination of references do not disclose the method of claim 59. For instance, the cited references, alone or in combination, do not disclose supplying different descriptions of user interfaces based on the roles of the users. In the Office Action, the Examiner cited column 44, lines 33-45, of Russell as disclosing the supplying operations as recited in the claim. *See* Office Action, page 27.

However, the cited section does not describe supplying different descriptions based on the roles of the users. Instead, the cited section describes assigning access privileges to a package. Specifically, Russell describes a developer that assigns access privileges of a role to the package so that users operating under that role have certain access to the package. Therefore, the combinations do not disclose supplying different descriptions based on the role of the users.

Accordingly, Applicants respectfully submit that the cited references do not render claim 59 unpatentable. As claims 60-62 are dependent directly or indirectly on claim 59, Applicants respectfully submit that claims 60-62 are patentable over the cited references for at least the reasons discussed above for claim 59. In view of the foregoing, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 59-62.

## Conclusion

In view of the foregoing, it is submitted that all pending claims, namely claims 20-27, 31-32, 35-38, 42-44, 46-53, and 56-63 are in condition for allowance. Reconsideration of the rejections and objections is requested. Allowance is earnestly solicited at the earliest possible date.

Respectfully submitted,

ADELI LAW GROUP PLC

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/Bum Pak/

Bum Pak

Reg. No. 56,916

Adeli & Tollen LLP  
1875 Century Park East, Suite 1360  
Los Angeles, CA 90067-2514  
Phone: (310) 785-0140 x305  
Fax: (310) 785-9558